

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ROTHSCHILD CONNECTED DEVICES §
INNOVATIONS, LLC §

Plaintiff, §

vs. §

AMERICAN HONDA MOTOR CO., INC. §

Defendant. §

ROTHSCHILD CONNECTED DEVICES §
INNOVATIONS, LLC §

Plaintiff, §

vs. §

MERCEDES- BENZ USA, LLC §

Defendant. §

Case No: 2:15-cv-01877-JRG-RSP

LEAD CASE

Case No: 2:15-cv-01880-JRG-RSP

CONSOLIDATED CASE

**PLAINTIFF ROTHSCCHILD CONNECTED DEVICES
INNOVATIONS, LLC's ANSWER TO COUNTERCLAIMS
OF DEFENDANT MERCEDES- BENZ USA, LLC**

Plaintiff Rothschild Connected Devices Innovations, LLC ("RCDI") respectfully submits this Answer to the counterclaims asserted by Mercedes-Benz USA, LLC ("Mercedes") in its Answer to First Amended Complaint and Counterclaims ("Answer").

COUNTERCLAIMS

NATURE OF THE LAWSUIT

1. RCDI admits that Mercedes is seeking declaratory judgment of non-infringement and invalidity. RCDI denies the remaining allegations contained in paragraph 1.

PARTIES

2. RCDI is without sufficient knowledge to form a belief as to the allegations contained in paragraph 2 and, therefore, denies same.

3. Admitted.

JURISDICTION AND VENUE

4. RCDI admits that this Court has subject matter jurisdiction over the counterclaims and that this is a compulsory counterclaim. RCDI denies the remaining allegations contained in paragraph 4.

5. RCDI admits that venue is proper in this judicial district. RCDI denies the remaining allegations contained in paragraph 5.

6. Admitted.

COUNT I

(Declaration of Non-Infringement)

7. RCDI incorporates its answers to paragraphs 1-6 herein.

8. RCDI admits that it has accused Mercedes of infringing claim 1 of the '090 Patent and that a case or controversy exists as to infringement of claim of the '090 Patent. RCDI denies the remaining allegations contained in paragraph 8.

9. Denied.

COUNT II

(Declaration of Invalidity)

10. RCDI incorporates its answers to paragraphs 1-9 herein.

11. Denied.

PRAYER FOR RELIEF

To the extent that any response is required to the Request for Relief, RCDI denies that Defendant is entitled to judgment or any of the relief it has requested.

Dated: March 3, 2016

Respectfully submitted,

/s/ Jay Johnson

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on March 3, 2016.

/s/ Jay Johnson

Jay Johnson